

THE LAW OFFICE OF GREGORY JAVARDIAN, LLC
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Attorney for Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:
Jammie M. Lyani
Debtor(s)

Chapter 7 Proceeding
19-14223 AMC

**STIPULATION BY AND BETWEEN GARY F. SEITZ, ESQUIRE, TRUSTEE,
AND CITIZENS BANK, N.A. S/B/M TO CITIZENS BANK OF PENNSYLVANIA**

WHEREAS, the parties hereto, and their respective counsel, have agreed as to the disposition of the Motion for Relief from the Automatic Stay filed on May 22, 2020 by Mary F. Kennedy, Esquire on behalf of mortgagee, Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania ("Movant").

NOW, THEREFORE, intending to be legally bound, the parties hereto, herewith stipulate as follows:

1. Movant is a mortgagee and holder of a perfected, secured claim against the Debtor pursuant to a Note and Mortgage on Debtor's real estate known as at 2328 Benson Street, Philadelphia, PA 19152. The last four digits of this loan number is 6807.

2. Upon approval by the United States Bankruptcy Court of the within Stipulation, Trustee, Gary F. Seitz, Esquire, and secured creditor, Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania, agree to the following:
- (a) The Trustee intends to try to sell the property.
 - (b) The Trustee agrees that the property shall be sold and, unless otherwise agreed to by the parties, Movant's mortgage lien (loan number ending in 6807) shall be paid in full on or before August 31, 2020.
 - (c) If any of the provisions in paragraph 2 (b) above are not completed by the date set forth therein the parties agree that Movant may certify the default to this Court and an Order shall be entered granting Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania and/or its successors and assigns relief from the automatic stay without further notice and hearing.
 - (d) Should Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania and/or its successors and assigns be granted relief from the stay after filing a Certification of Default in accordance with paragraph 2(c) above, the parties agree that the said relief order shall include the following language: "bankruptcy Rule 4001(a)(3) is not applicable and Movant is allowed to immediately proceed with foreclosure and all other relief available under the Non Bankruptcy law."
 - (e) The parties agree that a facsimile may be submitted to the Court as if it were an original.

STIPULATED AND AGREED TO BY:



Date: 6/16/2020

Holly S. Miller, Esquire
Attorney for Trustee



Date: 6/17/2020

Mary F. Kennedy, Esquire
Attorney for Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania

On this ____ day of _____, 2020, approved by the Court.

Date: June 22, 2020



United States Bankruptcy Judge
Ashely M. Chan

cc: Mary F. Kennedy, Esquire
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